

SEALED

AO 442 (Rev. 01/09) Arrest Warrant

UNITED STATES DISTRICT COURT
for the
Northern District of Oklahoma

United States of America
v.

FNU LNU,
a/k/a "Sor Angeles"
Defendant

12-0072 REL-01
Case No. 12-CR-030-JHP

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) FNU LNU, a/k/a "Sor Angeles"
who is accused of an offense or violation based on the following document filed with the court:

- Second
- ☐ Indictment ☒ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

- 18 U.S.C. § 1594(c) - Conspiracy to Engage in Sex Trafficking by Force, Fraud and Coercion
18 U.S.C. § 1594(d) - Criminal Forfeiture
18 U.S.C. §§ 1591(a)(2), 1594(a) and 2(a) - Sex Trafficking by Force, Fraud and Coercion
18 U.S.C. §§ 2422(a) and 2(a) - Coercion and Enticement To Travel in Interstate Commerce to Engage in Prostitution

Date: APR 03 2012

City and state: Tulsa, Oklahoma

[Signature]

Issuing officer's signature

Phil Lombardi, Clerk
Printed name and title

Return

This warrant was received on (date) 4-12-12, and the person was arrested on (date) 4-12-12
at (city and state) Kansas City, MO

Date: 4-13-12

[Signature]

Arresting officer's signature

Special Agent Garrett Hendrickson
Printed name and title

~~SEALED~~

FILED

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

MAR 07 2012

Phil Lombardi, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

**IGNACIO IJOM-BRITO,
ANTONIO FELIX VELASQUEZ-LOPEZ,
a/k/a "Tony",
SERMAIAS SAMUEL SANCHEZ-AJIN,
a/k/a "Luis Sanchez-Diaz",
a/k/a "Luis Diaz-Sanchez",
a/k/a "Luis",
ISRAEL VELASQUEZ-RAMIREZ,
a/k/a "Israel Velasquez-Lopez",
a/k/a "Marcos",
FNU LNU,
a/k/a "Sor Angeles",**

Defendants.

) **Case No. 12-CR-030-JHP**

) **FILED UNDER SEAL**

) **SUPERSEDING INDICTMENT**

) **[COUNT 1: 18 U.S.C. § 1594(c) -**

) **Conspiracy to Engage in Sex**

) **Trafficking by Force, Fraud and**

) **Coercion;**

) **COUNTS 2, 3 & 4: 18 U.S.C. §§**

) **1591(a)(2), 1594(a) and 2(a) - Sex**

) **Trafficking by Force, Fraud and**

) **Coercion;**

) **COUNT 5: 18 U.S.C. § 2422(a) -**

) **Coercion and Enticement to Travel in**

) **Interstate Commerce to Engage in**

) **Prostitution]**

)

)

)

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. § 1594(c)]

Beginning at least as early as in or about March 2011 and continuing until January 2012, in the Northern District of Oklahoma and elsewhere, the defendants, **IGNACIO IJOM-BRITO, ANTONIO FELIX VELASQUEZ-LOPEZ, a/k/a "Tony", SERMAIAS SAMUEL SANCHEZ-AJIN, a/k/a "Luis Sanchez-Diaz", a/k/a "Luis Diaz-Sanchez", a/k/a "Luis", ISRAEL VELASQUEZ-RAMIREZ, a/k/a "Israel Velasquez-Lopez", a/k/a "Marcos", and FNU LNU, a/k/a "Sor Angeles",** conspired, confederated and agreed, together

and with others known and unknown to the Grand Jury, to benefit, financially and by receiving anything of value, from participation in a venture that, in and affecting interstate and foreign commerce, had engaged in recruiting, enticing, harboring, transporting, providing, obtaining and maintaining women, whose identities are known and unknown to the Grand Jury, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud and coercion, and any combination of such means, would be used and were used to cause the women to engage in commercial sex acts, a violation of Title 18, United States Code, Section 1591(a)(2) ("the Conspiracy").

MEANS AND METHODS OF THE CONSPIRACY

It was part of the Conspiracy that the defendants, **IGNACIO IJOM-BRITO, ANTONIO FELIX VELASQUEZ-LOPEZ, SERMAIAS SAMUEL SANCHEZ-AJIN, ISRAEL VELASQUEZ-RAMIREZ**, and **FNU LNU**, a conspirator known to the Grand Jury by her alias "Sor Angeles", and others known and unknown to the Grand Jury ("the Conspirators"), would and did accomplish the object of the Conspiracy by, among others, the following means and methods:

1. The Conspirators would and did recruit, entice and transport women for the purpose of engaging in commercial sex acts.
2. The Conspirators would and did by means of force, threats of force, fraud and coercion cause women to engage in commercial sex acts.

3. The Conspirators would and did maintain apartments and other locations in cities, including Tulsa, Oklahoma, to harbor and maintain the women they used in their commercial sex trafficking venture and to conduct commercial sex acts.

4. The Conspirators would and did use poker chips to monitor the number of clients and the monies they paid for commercial sex acts.

5. The Conspirators would and did maintain notebooks and calendars to account for and schedule women used by the Conspirators in their commercial sex trafficking venture.

6. The Conspirators would and did take approximately one-half of the money earned by the women for the use and benefit of the Conspirators and their commercial sex trafficking venture.

7. The Conspirators would and did make the women buy food, clothing, condoms, lubricants, and other sex supplies with their own half of the money earned from the commercial sex acts.

8. The Conspirators would and did use cellular telephone communications to promote, facilitate and conduct their commercial sex trafficking venture.

All in violation of Title 18, United States Code, Section 1594(c).

COUNT TWO
[18 U.S.C. §§ 1591(a)(2) and 1594(a)]

On or about January 19, 2012, in the Northern District of Oklahoma and elsewhere, the defendants, **IGNACIO IJOM-BRITO, ANTONIO FELIX VELASQUEZ-LOPEZ, a/k/a "Tony", and FNU LNU, a/k/a "Sor Angeles"**, aiding and abetting each other and others known and unknown to the Grand Jury, in and affecting interstate and foreign commerce, knowingly benefitted, and attempted to benefit, financially and by receiving something of value from participation in a venture that engaged in recruiting, enticing, harboring, transporting, providing, obtaining and maintaining AH, a female individual whose identity is known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used and were used to cause AH to engage in commercial sex acts.

All in violation of Title 18, United States Code, Sections 1591(a)(2), 1594(a) and 2(a).

COUNT THREE
[18 U.S.C. §§ 1591(a)(2) and 1594(a)]

In or about November 2011, in the Northern District of Oklahoma, the defendants, **SERMAIAS SAMUEL SANCHEZ-AJIN**, a/k/a "Luis Sanchez-Diaz", a/k/a "Luis Diaz-Sanchez", a/k/a "Luis", and **FNU LNU**, a/k/a "Sor Angeles", aiding and abetting each other and others known and unknown to the Grand Jury, in and affecting interstate and foreign commerce, knowingly benefitted, and attempted to benefit, financially and by receiving something of value from participation in a venture that engaged in recruiting, enticing, harboring, transporting, providing, obtaining and maintaining BC, a female individual whose identity is known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used and were used to cause BC to engage in commercial sex acts.

All in violation of Title 18, United States Code, Sections 1591(a)(2), 1594(a) and 2(a).

COUNT FOUR
[18 U.S.C. §§ 1591(a)(2) and 1594(a)]

Beginning at least as early as November 2011 and continuing until January 2012, in the Northern District of Oklahoma and elsewhere, the defendants, **ISRAEL VELASQUEZ-RAMIREZ**, a/k/a "Israel Velasquez-Lopez", a/k/a "Marcos", and **FNU LNU**, a/k/a "Sor Angeles", aiding and abetting each other and others known and unknown to the Grand Jury, in and affecting interstate and foreign commerce, knowingly benefitted, and attempted to benefit, financially and by receiving something of value from participation in a venture that engaged in recruiting, enticing, harboring, transporting, providing, obtaining and maintaining BC, a female individual whose identity is known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used and were used to cause BC to engage in commercial sex acts.

All in violation of Title 18, United States Code, Sections 1591(a)(2), 1594(a) and 2(a).

COUNT FIVE
[18 U.S.C. § 2422(a)]

Beginning at least as early as March 2011 and continuing until January 2012, in the Northern District of Oklahoma, and elsewhere, the defendants, **IGNACIO IJOM-BRITO**, **ANTONIO FELIX VELASQUEZ-LOPEZ**, a/k/a "Tony", **SERMAIAS SAMUEL SANCHEZ-AJIN**, a/k/a "Luis Sanchez-Diaz", a/k/a "Luis Diaz-Sanchez", a/k/a "Luis", **ISRAEL VELASQUEZ-RAMIREZ**, a/k/a "Israel Velasquez-Lopez", a/k/a "Marcos", and **FNU LNU**, a/k/a "Sor Angeles", aiding and abetting each other and others known and unknown to the Grand Jury, knowingly persuaded, induced, enticed and coerced individuals, including AH, BC and others, both known and unknown to the Grand Jury, to travel in interstate commerce from other states to Oklahoma, to engage in prostitution and in sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2422(a) and 2(a).

THOMAS SCOTT WOODWARD
UNITED STATES ATTORNEY



R. TRENT SHORES
Assistant United States Attorney

A TRUE BILL

/s/Grand Jury Foreperson
Grand Jury Foreperson